# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:  ) Chapter 11 ) FTX TRADING LTD., et al., 1 ) Case No. 22-11068 (JTD)  Debtors. ) (Jointly Administered)		) Objection Deadline: May 8, 2023 at 4:00 p.m. (ET)
)	Debtors.	(Jointly Administered)
In re: ) Chapter 11	FTX TRADING LTD., et al.,1	) Case No. 22-11068 (JTD)
	In re:	) Chapter 11

# SUMMARY OF THIRD MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP, AS LEAD COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023

Name of Applicant:	Paul Hastings LLP ("Paul Hastings")
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors ("Committee")
Date of Retention:	Order entered February 7, 2023, effective as of December 20, 2022 [D.I. 635]
Period for Which Compensation and Reimbursement is Sought:	February 1, 2023 through and including February 28, 2023 (the "Fee Period")
Total Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$2,750,703.50
80% of Compensation Sought as Actual, Reasonable and Necessary:	\$2,200,562.80
100% of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$44,208.59

This is $a(n)$ : $X = mon$	thly interim	_ final application.
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No prior application has been made with respect to the Fee Period.

The last four digits of FTX Trading Ltd.'s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

#### **COMPENSATION BY INDIVIDUAL DURING THE FEE PERIOD\***

Name	Practice Group; Date of First Admission	Hourly Rate <sup>1</sup>	Hours Billed	Amount Billed
Partners				
Arai, Toshiyuki	Mergers & Acquisitions, 1985	\$1,710.00	5.70	\$9,747.00
Daniel, Chris	Fintech and Payments Group, 1999	\$1,585.00	26.10	\$41,368.50
Daniel, Chris	Fintech and Payments Group, 1999	\$1,700.00	17.10	\$29,070.00
Despins, Luc A.	Finance & Restructuring, 1986	\$1,860.00	7.40	\$13,764.00
Despins, Luc A.	Finance & Restructuring, 1986	\$1,975.00	3.30	\$6,517.50
Gilad, Erez	Finance & Restructuring, 2001	\$1,735.00	84.90	\$147,301.50
Gilad, Erez	Finance & Restructuring, 2001	\$1,875.00	51.90	\$97,312.50
Hansen, Kris	Finance & Restructuring, 1996	\$1,935.00	29.90	\$57,856.50
Hansen, Kris	Finance & Restructuring, 1996	\$2,075.00	59.30	\$123,047.50
Kelly, Brian	Finance & Restructuring,2001	\$1,510.00	18.20	\$27,482.00
Kelly, Brian	Finance & Restructuring,2001	\$1,625.00	12.30	\$19,987.50
Madell, Jamie	Structured Credit, 2012	\$1,700.00	15.80	\$26,860.00
Merola, Frank	Finance & Restructuring, 1988	\$1,735.00	51.30	\$89,005.50
Merola, Frank	Finance & Restructuring, 1988	\$1,875.00	39.60	\$74,250.00
Murphy, Matt M.	Finance & Restructuring, 1999	\$1,635.00	19.60	\$32,046.00
Murphy, Matt M.	Finance & Restructuring, 1999	\$1,750.00	11.60	\$20,300.00
Pasquale, Ken	Financial Restructuring, 1990	\$1,735.00	127.70	\$221,559.50

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Paul Hastings did not implement the firm's customary and firm-wide hourly rate adjustments in the Chapter 11 Cases as of January 1, 2023, resulting in a voluntary reduction of \$395,092.75 in fees. As reflected in the First Supplemental Declaration of Erez E. Gilad in Support of Monthly Fee Statement for Entry of an Order Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Lead Counsel to the Official Committee of Unsecured Creditors, Effective as of December 20, 2022, and Notice of Increase in Hourly Rates [Docket No. 630], Paul Hastings' standard hourly rates for 2023 will apply to its representation of the Committee in the Chapter 11 Cases effective as of February 14, 2023.

Name	Practice Group; Date of First	Hourly Rate <sup>1</sup>	Hours Billed	Amount Billed
	Admission			
Pasquale, Ken	Financial	\$1,875.00	94.60	¢177 275 00
_	Restructuring, 1990		94.60	\$177,375.00
Rimon, Laurel Loomis	Investigation & White	\$1,410.00	1.50	\$2,115.00
	Collar Defense, 1993		1.30	\$2,113.00
Rimon, Laurel Loomis	Investigation & White	\$1,525.00	0.60	\$915.00
2 21	Collar Defense, 1993	<b>** ** * * * * * * * *</b>	0.00	ψ, 12.00
Sasson, Gabe	Financial	\$1,510.00	58.20	\$87,882.00
0 01	Restructuring 2010	¢1.625.00		. ,
Sasson, Gabe	Financial	\$1,625.00	54.60	\$88,725.00
Sibbitt, Eric	Restructuring 2010	\$1,410.00		
Slooin, Eric	Fintech and Payments Group, 1997	\$1,410.00	26.60	\$37,506.00
Sibbitt, Eric	Fintech and Payments	\$1,550.00		
Sloom, Life	Group, 1997	\$1,550.00	11.90	\$18,445.00
Tsao, Leo	Investigation & White	\$1,410.00		
1540, 200	Collar Defense, 1999	ψ1,110.00	2.10	\$2,961.00
Tsao, Leo	Investigation & White	\$1,525.00	2.20	<b>#2.255.</b> 00
,	Collar Defense, 1999	, , , , , , , , , , , , , , , , , , , ,	2.20	\$3,355.00
	,	Partner Total	834.00	\$1,456,754.50
Of Counsel				
	Mergers &	\$1,475.00		
Levine, Eric M.	Acquisitions 2007		1.20	\$1,770.00
	Mergers &	\$1,525.00		
Levine, Eric M.	Acquisitions 2007		9.90	\$15,097.50
Martin, Samantha	Financial	\$1,485.00		
	Restructuring, 2008		64.70	\$96,079.50
Martin, Samantha	Financial	\$1,600.00	07.00	Φ1.40.C40.00
	Restructuring, 2008	#1 <b>22</b> 0 00	87.90	\$140,640.00
Manahant Haana A	Fintech and Payments	\$1,230.00	12.20	¢16 226 00
Merchant, Heena A.	Group, 2012	\$1,220,00	13.20	\$16,236.00
Merchant, Heena A.	Fintech and Payments Group, 2012	\$1,320.00	5.20	\$6,864.00
Silber, Gary	Tax, 2011	\$1,490.00	2.70	\$4,023.00
Silber, Gary	Tax, 2011	\$1,600.00	2.90	\$4,640.00
Traxler, Katherine A.	Financial	\$920.00	2.70	ψ+,0+0.00
Traxici, ixadicinic 11.	Restructuring, 1990	Ψ,20.00	5.50	\$5,060.00
Traxler, Katherine A.	Financial	\$1,025.00	2.20	ψ2,000.00
	Restructuring, 1990	¥ 1,0 <b>20.</b> 00	2.30	\$2,357.50
		f Counsel Total	195.50	\$292,767.50
Associates			-	, , , , , , , , , , , , , , , , , , , ,
Ahluwalia, Sainaya	Financial	\$505.00		
K.	Restructuring		0.60	\$303.00
Ashuraey, Sam	Financial	\$1,160.00		
	Restructuring, 2017		0.60	\$696.00
Ashuraey, Sam	Financial	\$1,270.00		
	Restructuring, 2017		32.50	\$41,275.00
Burns, Elena Gold	Private Equity	\$930.00	4.10	\$3,813.00

Name	Practice Group; Date of First	Hourly Rate <sup>1</sup>	Hours Billed	Amount Billed
	Admission			
Burns, Elena Gold	Private Equity	\$1,125.00	5.50	\$6,187.50
Catalano, Kristin	Financial	\$775.00		
	Restructuring, 2021		4.50	\$3,487.50
Catalano, Kristin	Financial	\$915.00		
	Restructuring, 2021		52.00	\$47,580.00
Daly, Crispin	Financial	\$1,230.00		
	Restructuring, 2010		2.00	\$2,460.00
Diaz, Caroline	Financial	\$930.00		
	Restructuring, 2021		47.20	\$43,896.00
Diaz, Caroline	Financial	\$1,125.00		
	Restructuring, 2021		23.20	\$26,100.00
	Fintech and Payments	\$755.00		
Fedler, Kayla	Group, 2022		13.70	\$10,343.50
	Fintech and Payments	\$855.00	12.00	
Fedler, Kayla	Group, 2022		13.00	\$11,115.00
Fisher, Michael J.	Complex Litigation &	\$930.00	22.40	Φ20.022.00
T' 1	Arbitration, 2020	Φ1 1 <b>25</b> 00	22.40	\$20,832.00
Fisher, Michael J.	Complex Litigation &	\$1,125.00	2.70	#2 02 <b>7</b> 50
C 1 1 1	Arbitration, 2020	Φ1 <b>22</b> 5 00	2.70	\$3,037.50
Greenbacker, Lauren-	Fintech and Payments	\$1,225.00	17.50	Ф <b>21</b> 427 50
Kelley	Group, 2014	¢1 220 00	17.50	\$21,437.50
Greenbacker, Lauren-	Fintech and Payments	\$1,320.00	12.20	¢16 226 00
Kelley	Group, 2014	£1 220 00	12.30	\$16,236.00
Griffin, Meagan E.	Fintech and Payments	\$1,230.00	24.60	¢20.259.00
Cuiffin Massau E	Group, 2013	¢1 220 00	24.00	\$30,258.00
Griffin, Meagan E.	Fintech and Payments Group, 2013	\$1,320.00	11.10	\$14,652.00
	Financial	\$930.00	11.10	\$14,032.00
Iaffaldano, Jack	Restructuring, 2020	\$930.00	32.60	\$30,318.00
Tarraidano, Jack	Financial	\$1,125.00	32.00	\$50,510.00
Iaffaldano, Jack	Restructuring, 2020	\$1,123.00	28.60	\$32,175.00
iumundano, suck	Fintech and Payments	\$775.00	20.00	ψ32,173.00
Khoury, Gabriel	Group, 2021	ψ113.00	4.80	\$3,720.00
Tenoury, Guorier	Fintech and Payments	\$915.00	1.00	ψ3,720.00
Khoury, Gabriel	Group, 2021	ψ 13.00	3.70	\$3,385.50
Koch, Leonie	Financial	\$755.00	2170	ψο,ο σο το σ
120011, 2001110	Restructuring, 2023	4,00.00	84.50	\$63,797.50
Koch, Leonie	Financial	\$855.00		<del>+ , </del>
,	Restructuring, 2023		112.80	\$96,444.00
	Financial	\$755.00		,
Miliotes, Lanie	Restructuring, 2023		7.20	\$5,436.00
·	Financial	\$855.00		*
Miliotes, Lanie	Restructuring, 2023		45.60	\$38,988.00
	Fintech and Payments	\$1,120.00		
Nizamian, Andrew A.	Group, 2017		46.10	\$51,632.00
	Fintech and Payments	\$1,235.00		
Nizamian, Andrew A.	Group, 2017		17.80	\$21,983.00

Name	Practice Group; Date of First	Hourly Rate <sup>1</sup>	Hours Billed	Amount Billed
0 " 1: 0 1 4	Admission	Φ020.00		
Quattrocchi, Sarah A.	Fintech and Payments	\$930.00	0.60	¢0.020.00
Quattrocchi, Sarah A.	Group, 2020	¢1 125 00	9.60	\$8,928.00
Quattrocciii, Saran A.	Fintech and Payments Group, 2020	\$1,125.00	14.00	\$15,750.00
Sasson, Isaac	Financial	\$1,200.00	14.00	\$13,730.00
Sasson, Isaac	Restructuring, 2016	\$1,200.00	64.80	\$77,760.00
Sasson, Isaac	Financial	\$1,290.00	01.00	Ψ77,700.00
Subson, Isaac	Restructuring, 2016	ψ1,290.00	83.80	\$108,102.00
	Investigation & White	\$930.00	02.00	ψ100,10 <b>2</b> .00
Seelig, Ben	Collar Defense, 2020	4,20,00	19.70	\$18,321.00
	Investigation & White	\$1,125.00	2,1,0	4-0,0
Seelig, Ben	Collar Defense, 2020	*-,	18.10	\$20,362.50
Thrasher, Karin	Fintech and Payments	\$775.00		. ,
,	Group, 2021	,	12.10	\$9,377.50
Thrasher, Karin	Fintech and Payments	\$915.00		,
, and the second	Group, 2021		22.00	\$20,130.00
Wong, Nicole	Tax, 2023	\$855.00	0.50	\$427.50
Xu, Christine	Financial	\$775.00		
	Restructuring, 2022		10.10	\$7,827.50
Xu, Christine	Financial	\$915.00		
	Restructuring, 2022		7.60	\$6,954.00
		<b>Associate Total</b>	935.50	\$945,528.50
Attorneys				
Endo, Katsumi	Mergers &	\$550.00		
	Acquisitions, 2022		9.60	\$5,280.00
Turanchik, Stephen	Tax, 1996	\$1,240.00	1.80	\$2,232.00
		<b>Attorney Total</b>	11.40	\$7,512.00
Paraprofessionals	1			
Funao, Miho	Administrative	\$235.00	2.40	<b>#</b>
T 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Professional	Φ <b>71</b> 7 00	3.40	\$799.00
Laskowski, Mat	Financial	\$515.00	26.70	Φ10 000 <b>5</b> 0
T 1 1' M.	Restructuring	Φ740.00	36.70	\$18,900.50
Laskowski, Mat	Financial	\$540.00	20.00	¢21 546 00
Lana Marma	Restructuring	\$355.00	39.90	\$21,546.00
Lopez, Mayra	Technical Operations Senior Analyst	\$333.00	1.10	\$200.50
Lopez, Mayra	Technical Operations	\$375.00	1.10	\$390.50
Lopez, Mayra	Senior Analyst	\$373.00	1.50	\$562.50
Magzamen, Michael	Financial	\$515.00	1.30	\$302.30
iviagzamen, mienaei	Restructuring	ψυ1υ.00	6.60	\$3,399.00
Magzamen, Michael	Financial	\$540.00	0.00	ψ3,399.00
iviagzamen, ivitenaci	Restructuring	ψυποιου	3.70	\$1,998.00
Mohamed, David	Financial	\$515.00	3.70	Ψ1,220.00
1.131idilloa, David	Restructuring	\$212.00	0.50	\$257.50
O'Dea, Heather	Legal Research	\$360.00	3.23	<i>\$207.00</i>
,	Analyst	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	0.80	\$288.00
		ofessional Total	94.20	\$48,141.00

Name	Practice Group; Date of First Admission	Hourly Rate <sup>1</sup>	Hours Billed	Amount Billed
TOTAL:			2070.60	\$2,750,703.50
BLENDED HOURLY RATE:		\$1,328		

<sup>\*</sup> The hourly rates billed by Paul Hastings set forth in this Monthly Fee Statement are Paul Hastings' rates for 2023. As reflected in the *First Supplemental Declaration of Erez E. Gilad in Support of Monthly Fee Statement for Entry of an Order Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Lead Counsel to the Official Committee of Unsecured Creditors, Effective as of December 20, 2022, and Notice of Increase in Hourly Rates* [Docket No. 630], Paul Hastings' new standard hourly rates for 2023 will apply to its representation of the Committee in these chapter 11 cases effective as of February 14, 2023.

### COMPENSATION BY PROJECT CATEGORY FOR THE FEE PERIOD

	U.S. Trustee Task Code and Project Category	Hours Billed	Amount Billed
B110	Case Administration	50.60	\$28,216.00
B112	General Creditor Inquiries	4.60	\$6,266.00
B113	Case Analysis/Pleadings Review	25.70	\$36,331.50
B115	Meetings and Communications with Debtors	114.30	\$181,391.00
B120	Asset Analysis and Recovery	260.90	\$356,058.02
B130	Asset Disposition	98.70	\$149,447.50
B150	Meetings and Communications with Creditors	282.60	\$425,213.50
B155	Court Hearings	59.90	\$82,635.50
B160	Employment Applications / Fee Statements and Applications (Paul Hastings)	87.00	\$127,869.00
B165	Employment Applications / Fee Statements and Applications (Other Professionals)	137.70	\$207,135.00
B175	Bahamian PropCo Analysis	35.80	\$51,432.50
B180	Avoidance Action Analysis	205.00	\$241,333.50
B185	Assumption / Rejection of Leases and Contracts	1.60	\$2,145.00
B189	Monitoring or Participating in Related Cryptocurrency Bankruptcy	16.60	\$19,184.00
B190	Other Contested Matters (excl. assumption/rejections motions)	62.30	\$81,957.50
B191	General Litigation	54.70	\$56,948.98
B210	Business Operations	31.70	\$35,373.00
B211	Financial Reports (Monthly Operating Reports)	0.60	\$975.00
B215	Regulatory Matters	229.00	\$305,481.50
B220	Employee Benefits/Pensions	2.00	\$3,274.00
B240	Tax Issues	8.30	\$11,950.50
B261	Investigations	298.10	\$337,451.00
B310	Claims Administration and Objections	2.60	\$2,472.00
B320	Plan and Disclosure Statement (including Business Plan)	0.30	\$162.00
TOTA	L:	2070.60	\$2,750,703.50

## EXPENSE SUMMARY FOR THE FEE PERIOD

Category	Amount
Computer Search (Other)	\$15,629.94
Lodging	\$350.00
Outside Professional Services	\$23,612.70
Reproduction Charges	\$102.16
Reproduction Charges (Color)	\$2,260.00
Taxi/Ground Transportation	\$1,825.24
Meals	\$341.75
Court Call	\$70.00
Court Transcript	\$16.80
TOTAL:	\$44,208.59

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	) Objection Deadline: May 8, 2023 at 4:00 p.m. (ET)
Debtors.	) (Jointly Administered)
FTX TRADING LTD., et al.,1	) Case No. 22-11068 (JTD)
In re:	) Chapter 11

THIRD MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP, AS LEAD COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023

Pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 435] (the "Interim Compensation Order"), Paul Hastings LLP ("Paul Hastings"), lead counsel to the Official Committee of Unsecured Creditors (the "Committee") appointed in the chapter 11 cases (the "Chapter 11 Cases") of the above-captioned debtors and debtors-in-possession (the "Debtors"), hereby submits this monthly fee statement (this "Monthly Fee Statement") for compensation of fees and reimbursement of costs and expenses incurred by Paul Hastings for professional services rendered by Paul Hastings during the period from February 1, 2023 through and including February 28, 2023 (the "Fee Period") for or on behalf of the Committee in connection with the Chapter 11 Cases. In support of this Monthly Fee Statement, Paul Hastings respectfully states as follows:

The last four digits of FTX Trading Ltd.'s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

#### **Background**

- 1. On November 11 and November 14, 2022, respectively, each of the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code with this Court. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. As of the date hereof, no trustee or examiner has been appointed in the Chapter 11 Cases.
- 2. On December 20, 2022, the Office of the United States Trustee for the District of Delaware (the "<u>U.S. Trustee</u>") filed the *Amended Notice of Appointment of Committee* of Unsecured Creditors [Docket No. 261]<sup>2</sup> appointing the Committee.
- 3. On December 20, 2022, the Committee selected Paul Hastings to serve as its lead counsel in connection with the Debtors' Chapter 11 Cases.
- 4. On February 7, 2023, the Court entered the *Order Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Lead Counsel to the Official Committee of Unsecured Creditors, Effective as of December 20, 2022* [D.I. 635] (the "Retention Order"), authorizing the retention and employment of Paul Hastings as lead counsel to the Committee, effective as of December 20, 2022. The Retention Order authorizes Paul Hastings to be compensated for its services at its regular hourly rates in effect from time to time, as such rates may be increased periodically, and reimbursed for any costs and expenses incurred in connection with its representation of the Committee in connection with the Chapter 11 Cases, as set forth therein.

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The notice amended the initial *Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 231] issued by the U.S. Trustee on December 15, 2022, to reflect the addition and correction of contact information for certain of the members of the Committee.

#### **Relief Requested**

5. By this Monthly Fee Statement, Paul Hastings seeks (a) allowance of compensation as an administrative expense claim against each of the Debtors' estates for fees and expenses incurred in the aggregate amount of \$2,750,703.50, (b) payment in the amount of \$2,200,562.80, representing eighty-percent (80%) of the total amount of fees incurred, and (c) payment in the amount of \$44,208.59, representing one-hundred percent (100%) of the total amount of costs and expenses incurred, in each case, in connection with work performed by Paul Hastings during the Fee Period for or on behalf of the Committee in connection with the Chapter 11 Cases.

#### **Compensation Requested**

- 6. Paul Hastings maintains computerized records of the time spent by all Paul Hastings' attorneys and paraprofessionals in connection with its representation of the Committee.

  A detailed statement of work performed by Paul Hastings rendering legal services to the Committee during the Fee Period is attached hereto as **Exhibit A**.
- 7. The timekeepers who rendered services related to each category are identified in **Exhibit A**, along with the number of hours for each individual and the total compensation sought by each category.

#### **Expense Reimbursement**

8. A detailed statement of the actual and necessary costs and expenses incurred by Paul Hastings during the Fee Period in the aggregate amount of \$44,208.59 in the performance of services rendered to the Committee is attached hereto as **Exhibit B**. The expenses are categorized according to the nature of the charges incurred, including, among other things, telephone and facsimile charges, mail charges, special or hand delivery charges, document

processing, photocopying charges, travel expenses, transportation costs, expenses for "working meals", computerized research and other research costs.

9. Pursuant to Local Rule 2016-2, Paul Hastings represents that: (a) its rate for copying charges is \$0.08 per page for black and white copies and \$0.50 per page for color copies; (b) its rate for outgoing facsimile transmissions is \$0.25 per page (excluding related long distance transmission charges) with no charge for incoming facsimile transmissions; and (c) computer-assisted legal research is charged at rates not more than the actual cost.

#### **Valuation of Services**

- 10. Attorneys and paraprofessionals of Paul Hastings have expended a total of 2070.60 hours in connection with its representation of the Committee during the Fee Period. The amount of time spent by each Paul Hastings timekeeper providing services to the Committee for the Fee Period is set forth herein and in the attached monthly statement. Paul Hastings respectfully submits that the reasonable value of the services rendered by Paul Hastings to the Committee during the Fee Period is \$2,750,703.50.
- 11. Paul Hastings believes that the description of the time entries included in **Exhibit A** attached hereto and the expenses set forth in **Exhibit B** attached hereto are in compliance with the requirements of Local Rule 2016-2.

#### **Reasonableness of Compensation**

12. All fees and expenses incurred by Paul Hastings during the Fee Period for or on behalf of the Committee were actual, reasonable and necessary in the performance of Paul Hastings' services. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, all fees and expenses requested by Paul Hastings in this Monthly Fee Statement are reasonable due to (a) the size, nature and complexity of these Chapter 11 Cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, (e) the

costs of comparable services other than in a case under chapter 11 of the Bankruptcy Code, and (f) the fact that such fees and expenses were not unnecessarily duplicative of the services performed by other professionals retained by the Committee.

#### **Compliance and Waiver**

13. To the best of Paul Hastings' knowledge, this Monthly Fee Statement complies with Local Rule 2016-2. To the extent that this Monthly Fee Statement does not comply in all respects with the requirements of Local Rule 2016-2, Paul Hastings believes that such deviations are not material and respectfully requests that any such requirements be waived.

#### **Reservation of Rights**

- 14. To the extent that time or disbursement charges for services rendered or disbursements incurred on behalf of the Committee during the Fee Period were not inputted, processed or posted before the preparation of, or included in, this Monthly Fee Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Fee Period on behalf of the Committee, Paul Hastings reserves the right to request compensation for such services and reimbursement of such expenses in a supplemental or future Monthly Fee Statement.
- 15. In addition, Paul Hastings does not waive, and expressly reserves, its right to respond to any objections regarding this Monthly Fee Statement and the amounts sought for Paul Hastings' work performed by or on behalf of the Committee in connection with the Chapter 11 Cases.

#### **Notice and No Prior Request**

16. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee, (b) the Debtors, (c) the

Committee, and (d) all parties required to be given notice in the Interim Compensation Order. Paul Hastings submits that no other or further notice is necessary.

17. No prior request for the relief sought in this Monthly Fee Statement for fees and expenses incurred during the Fee Period has been made to this or any other Court.

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WHEREFORE, Paul Hastings respectfully requests that the Court approve the Monthly Fee Statement and grant Paul Hastings such other and further relief as the Court deems just and proper.

Dated: April 17, 2023

New York, New York

PAUL HASTINGS LLP

/s/ Erez E. Gilad

Kristopher M. Hansen\*

Erez E. Gilad\* Gabriel E. Sasson\* 200 Park Avenue New York, NY 10166

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**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 2016-2** 

I, Erez E. Gilad, hereby certify as follows:

I am a partner in the applicant firm, Paul Hastings LLP, and have been 1.

admitted to the bar of the State of New York since 2001.

2. I have personally performed many of the legal services rendered by Paul

Hastings, as lead counsel for the Committee, and I am generally familiar with all other work

performed on behalf of the Committee by the lawyers and paraprofessionals in the firm.

3. The facts set forth in the foregoing Monthly Fee Statement are true and

correct to the best of my knowledge, information, and belief. Moreover, I have reviewed the

requirements of Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the

United States Bankruptcy Court for the District of Delaware and respectfully submit that the

Monthly Fee Statement complies with such requirements.

Dated: April 17, 2023

New York, New York

/s/ Erez E. Gilad

Erez E. Gilad